



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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MEMORANDUM

To: Trisha Henshaw
Board Executive Director
Common Interest Community Board

From: Justin I. Bell
Assistant Attorney General

Date: November 4, 2019

Subject: Letter of Assurance for Periodic Review of Time-Share Regulations, 18 VAC 48-45.

Pursuant to the Code of Virginia and Executive Order 14 (2018), a periodic review of a regulation every four years shall include an examination by the Office of the Attorney General to ensure statutory authority. In that regard, I have reviewed the Board of Housing and Community Development's Regulations referenced above. In my view, these regulations may be retained without change according to Titles 54.1 and 55 of the *Code of Virginia*. The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect.

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.